

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

NICOLE CHILDRESS, )  
                          )  
Plaintiff,            )     CASE NO.: 4:18-cv-02036  
                          )  
v.                     )  
                          )  
CREDIT CONTROL SERVICES, INC., )  
                          )  
Defendant.            )

**DEFENDANT CREDIT CONTROL SERVICE, INC.'S**  
**NOTICE OF REMOVAL**

COMES NOW Credit Control Service, Inc., by and through counsel, to file this Notice of Removal.

**REMOVED ACTION**

1. Credit Control Service, Inc. ("Defendant") is the named Defendant in a civil action Plaintiff filed in the Circuit Court of St. Louis County, Missouri on September 14, 2018, and served upon Defendant on November 5, 2018.

**PAPERS FROM REMOVED ACTION**

2. Pursuant to 28 U.S.C. § 1446(a) and Local Rule 2.03, Defendant has attached to this Notice of Removal a copy of the documents filed in State Court for the removed case, including a copy of all process, pleadings, and Orders served on Defendant as of the date of removal.

**THE VENUE REQUIREMENT IS SATISFIED**

3. Venue of this removal is proper under 28 U.S.C. § 1441(a) because this Court is the United States District Court for the district and division corresponding to the place where the State Court action is pending.

**REMOVAL IS TIMELY**

4. Plaintiff's Petition was served upon Defendant on November 5, 2018. This Notice of Removal is filed within thirty (30) days of Defendant's receipt of Plaintiff's Petition, and is thus timely filed under 28 U.S.C. § 1446(b).

**FEDERAL QUESTION**

5. According to Plaintiff's Petition, this is an action for alleged violations of the Fair Debt Collection Practices Act, 15 U.S.C. §1692, *et seq.* ("FDCPA").

6. Under FDCPA § 1692k(d), this Court has original federal question subject matter jurisdiction of this action without regard to the amount in controversy. In addition, this action arises under the laws of the United States, specifically the FDCPA; therefore, this Court has subject matter jurisdiction under 28 U.S.C. § 1331. Accordingly, this action may be removed to this Court, as provided by 28 U.S.C. 1441(a) and (c)(1)(A).

**FILING OF REMOVAL PAPERS**

7. Under 28 U.S.C. § 1446(d), written notice of the removal of this action has been given simultaneously to Plaintiff's counsel, and a Notice to Clerk of Removal has been simultaneously filed with the Circuit Court of the City of St. Louis, State of Missouri.

WHEREFORE, Defendant Credit Control Service, Inc. does hereby remove the above captioned action from the Circuit Court of the St. Louis County, Missouri and requests that further proceedings be conducted in this Court as provided by law.

Respectfully submitted,

**CREDIT CONTROL SERVICE, LLC**

By: /s/ Dennis J. Barton III  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on December 5, 2018, a true copy of the foregoing was served upon the party below by electronically mail and/or federal court's CM/ECF:

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